



October 12, 2020

Via ECF

Hon. Jesse M. Furman
United States District Judge
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

Re: *Freeze n Fit, Inc. v. Ran Cory and Cory Group*
Civil Action No.: 1:20-cv-05898-JMF

Dear Judge Furman:

We represent Plaintiff Freeze n' Fit in the above matter. We are writing pursuant to Your Honor's Individual Rules and Practices to respectfully request an adjournment of the upcoming initial pretrial conference scheduled for October 22, 2020 at 3:15pm (Dkt. 8), and the October 15, 2020 due date to file a joint letter and proposed Civil Case Management Plan and Scheduling Order in advance of the conference.

Service of process has not been effected yet on Defendants, who are a foreign individual and foreign company. Pursuant to Fed. R. Civ. P. 4(m), the normal ninety (90) day period for service does not apply, so as to allow time for service to be effected in a foreign country.

In view thereof, Plaintiff respectfully requests an adjournment of the due dates for the conference and pre-conference submissions until after service of process has been completed. Plaintiff intends to file proof of service with the Court once the Defendants have been served, and respectfully requests that new dates be entered once proof of service has been filed.

No previous requests for adjournments have been made. As the pre-trial conference is the first conference and no schedule has yet been ordered by the Court, adjournment will not affect any milestone in the case.

We thank the Court in advance for its attention to this matter.

Sincerely yours,

/s/ Morris E. Cohen

Morris E. Cohen

Application GRANTED. The conference currently scheduled for October 22, 2020 is ADJOURNED to **December 3, 2020 at 4:00 p.m.** The Clerk of Court is directed to terminate ECF No. 9. SO ORDERED.

October 13, 2020